

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**Free Speech Systems, LLC,

Debtor.**

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Case No. 22–60043

**Chapter 11
Subchapter V**

**ORDER GRANTING THE TEXAS PLAINTIFFS’ EMERGENCY MOTION TO
COMPEL DISCOVERY FROM PQPR HOLDINGS LIMITED, LLC**

Upon the Texas Plaintiffs’ Emergency Motion to Compel Discovery from PQPR Holdings Limited, LLC (the “**Motion**”)¹; and the district court having jurisdiction under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157; and this Court having found that venue of this proceeding the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and this Court having reviewed the Motion; having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Texas Plaintiffs’ Motion to Compel is hereby **GRANTED**.
2. Within 7 calendar days of this Order, PQPR will perform a reasonable search for and produce all non-privileged documents responsive to all requests in *The Sandy Hook Plaintiff’s First Set of Interrogatories and First Requests for Production of Documents to PQPR Holdings Limited, LLC*.

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

3. The responsive documents shall be produced in the manner and format set forth in the Instructions of the Requests, to wit, in TIFF or native format with all available metadata.

4. Within 7 days, PQPR shall also give complete and accurate replies to all interrogatories in the Requests in the manner and format set forth in the Instructions therein.

5. To the extent that PQPR is unable to locate or to obtain any documents responsive to a specific request, it shall, for each individual request, provide the Texas Plaintiffs with a written certification, signed pursuant to Rule 11 of the Federal Rules of Civil Procedure, that PQPR has exhausted all reasonable efforts to obtain any responsive documents and is not in the possession, custody, or control of any responsive, non-privileged documents.

SIGNED THIS _____ DAY OF _____, 2022.

**THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE**